



September 15, 2011

Ms. Carmen Santos
U.S. EPA Region 9
Mail Code WST-4
75 Hawthorne Street
San Francisco, California 94105

Re: Request for Alteration
Final Risk-Based PCB Disposal Approval Application, Former Petrolane-Lomita Gas Plant
2851 Orange Avenue
Long Beach, California
EPA I.D. No. CAR000214189

EPI Project No. 00464.2

Dear Ms. Santos,

On behalf of AmeriGas Propane, LP (AmeriGas), Environmental Partners, Inc. (EPI) is submitting this request for an alteration of the *Final Risk-Based PCB Disposal Approval Application, Former Petrolane-Lomita Gas Plant* dated July 11, 2011 (Application). The Application describes the intended methods to remediate soil and concrete with total polychlorinated biphenyl (PCB) concentrations (as Aroclors) greater than 0.22 milligrams/kilogram (mg/kg) located at 2851 Orange Avenue in Long Beach, California (subject property). The Environmental Protection Agency – Region 9 (EPA - Region 9) conditionally approved the Application on July 29, 2011.

Alteration

EPI is respectfully requesting that EPA - Region 9 grant an alteration to the Application to allow for the collection and analysis of characterization soil samples northwest and south of the northern portion of Building L. Previously, EPA – Region 9 granted an alteration of the Application to allow for the collection of characterization soil samples to delineate the horizontal extent of soil contamination discovered beneath the concrete floor of the northern portion of Building L. Analytical results for characterization soil samples collected on September 9, 2011 indicate the presence of PCB in concentrations greater than 0.22 mg/kg in the northwesternmost and southeasternmost samples. The requested Application alteration is necessary so that the newly discovered PCB soil impacts can be delineated and a remedial excavation plan can be developed.

EPI proposes to collect additional characterization soil samples in two separate locations: west of previously collected and analyzed "step-out" soil sample locations VL-I10, VL-K10, and VL-M10; and south of previously collected and analyzed "step-out" soil sample locations VL-E40 and VL-E70. Specifically, EPI proposes to collect additional "step-out" soil samples on the pre-established 10-foot by 10-foot grid pattern at the following locations:

Sample locations collected for immediate analysis-

- | | |
|------------|------------|
| • VL-D40 | • VL-K(10) |
| • VL-D70 | • VL-M(10) |
| • VL-E30 | • VL-N10 |
| • VL-I(10) | |

Sample locations to be collected and archived for potential future analysis-

- | | |
|------------|------------|
| • VL-C40 | • VL-K(20) |
| • VL-C70 | • VL-M(20) |
| • VL-I(20) | • VL-O10 |

Additional Alteration

If laboratory analysis of the above proposed soil samples indicates the presence of PCB concentrations greater than 0.22 mg/kg, EPI also requests an additional alteration of the Application to allow for continuation of step-out characterization soil samples. The samples will be collected at locations consistent with the alpha-numeric soil sample grid previously established until the horizontal limits of PCB concentrations greater than 0.22 mg/kg have been delineated. Granting of this additional alteration request will allow for more efficient collection of necessary characterization data, if needed. If at any time a deviation from the pre-established grid becomes necessary, AmeriGas will request an additional alteration from EPA prior to sample collection.

Closing

EPI and AmeriGas appreciate EPA's expeditious review of this request. If you have any questions or comments, please feel free to contact Mr. Jerry Boyd (EPI) at (425) 395-0010 or Mr. Steve Samuel at (610) 337-7000, extension 3630.

Sincerely,

Electronically Submitted

Jerry L. Boyd, P.G.
Senior Geologist

QR EMK

TR EMK

Cc Steve Samuel - AmeriGas Partners, LP
Amy Bodek - City of Long Beach
Steve Lavinger - California DTSC